

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

THE CITY OF HUNTINGTON,  
Plaintiff,

v.

AMERISOURCEBERGEN DRUG CORPORATION, *et al.*  
Defendants

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CABELL COUNTY COMMISSION,  
Plaintiff,

v.

AMERISOURCEBERGEN DRUG CORPORATION, *et al.*  
Defendants

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Civil Action No. 3:17-01362

**PLAINTIFFS' UNDER SEAL APPENDIX OF EXHIBIT 1 IN SUPPORT OF  
OPPOSITION TO DEFENDANTS' DAUBERT MOTION TO EXCLUDE THE  
OPINIONS OF JAMES GELDHOF**

October 23, 2020

This Appendix consists of the attached Exhibit 1 (excerpts from the transcript of the deposition of James Geldhof, conducted on September 22, 2020). These materials are filed under seal.

Dated: October 23, 2020

Respectfully submitted,

THE CITY OF HUNTINGTON

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CABELL COUNTY COMMISSION

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**CERTIFICATE OF SERVICE**

I certify that on October 23, 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. This filing will also be served on all parties by email to: [Track2OpioidDefendants@ReedSmith.com](mailto:Track2OpioidDefendants@ReedSmith.com) and [mdl2804discovery@motleyrice.com](mailto:mdl2804discovery@motleyrice.com).

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# **Exhibit 1**



Page 2

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32 ALSO PRESENT:  
33 Chris Leigh, Videographer

1           A. When they asked me to prepare this witness  
2 report, the purpose of it was to assist the court in  
3 giving an inside look or basically DEA's role within the  
4 closed system of distribution. Knowing that, I wanted  
5 to look at certain documents I thought would impact my  
6 ability to make that -- you know, that -- that report.

7           Q. And what were those categories of documents you  
8 wanted to look at that would impact that report?

9           A. I wanted to look at the actions taken by DEA.  
10 I wanted to take a look at the Congressional inquiry  
11 into West Virginia. I wanted to look at correspondence  
12 between DEA and HDMA in guiding -- in policy guidance.  
13 I'm trying to think of anything else off the top of my  
14 head. There were other -- I wanted to look at the --  
15 the suspicious -- the -- I'm sorry, the meetings that  
16 Rannazzisi had, the distributor initiative meetings. I  
17 wanted to look at Rannazzisi's letter. I wanted to look  
18 at the letters that DEA sent -- the Math\* letters where  
19 he sent back to I think it was Mr. Walker, a culmination  
20 of the meetings. I'd have to go through the report and  
21 look at others. Those are off the top of my head.

22           Q. Why was it important to you to look at actions  
23 taken by the DEA?

24           A. Because I think it summarizes our response to